

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

MARY CAMPBELL,)	CIVIL DIVISION
)	
Plaintiff,)	No: 2:21-CV-366
)	
v.)	
)	ELECTRONICALLY FILED
MIDLAND CREDIT MANAGEMENT,)	
INC.,)	
)	JURY TRIAL DEMANDED
Defendant.)	

PETITION FOR REMOVAL OF CIVIL ACTION

PLEASE TAKE NOTICE, Defendant, MIDLAND CREDIT MANAGEMENT, INC. ("hereinafter referred to as "Midland"), hereby removes to this Court the state court action described below.

1. On or about January 8, 2021, Plaintiff filed an action in the Court of Common Pleas of Allegheny County, Pennsylvania, entitled and captioned: *Mary Campbell v. Midland Credit Management, Inc.* and assigned Case No: GD 21-000296 via Praecipe for Writ of Summons
2. Plaintiff's Complaint was filed with the Court at the above-referenced docket number on February 5, 2021.
3. Plaintiff's Complaint was served upon Defendant on February 16, 2021.
4. The following pleadings have been filed in this action to date:
 - (a) Praecipe for Writ of Summons;
 - (b) Complaint;
 - (c) Praecipe for Appearance; and

(d) Notice of Filing of Petition for Removal of a Civil Action.

See pleadings attached hereto as Exhibit “A”.

5. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. §1331, and is one which may be removed to this Court by Defendant pursuant to the provisions of 28 U.S.C. §1441(b) in that it arises under the Fair Debt Collection Practices Act (“FDCPA”) 15 U.S.C. §1692a, *et seq.*

6. The Court of Common Pleas of Allegheny County, Pennsylvania, Civil Division, is located within the jurisdiction of the United States Court for the Western District of Pennsylvania. This Court is the court embracing the place where the action is pending.

7. This Complaint is removable to the United States District Court for the Western District of Pennsylvania, from the Court of Common Pleas of Allegheny County, Pennsylvania, Civil Division pursuant to 28 U.S.C. §1331, §1441 and §1681.

8. The Complaint alleges the action is brought under the FDCPA. As such, this Court has federal question jurisdiction over this action pursuant to 28 U.S.C. §1331.

9. This Notice of Removal is being filed within 30 days of the date upon which Plaintiff’s Complaint was served.

10. Pursuant to 28 U.S.C. §1446(b), a Notice of Removal “shall be filed within thirty days after receipt by the Defendant, through service or otherwise, of a copy of the initial pleading.

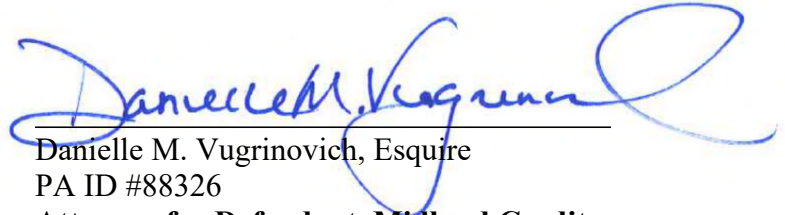
11. Concurrently, Defendant provided written notice of this Petition for Removal to Plaintiff’s counsel and filed a copy with the Court of Common Pleas of Allegheny County, Pennsylvania, Civil Division, as required by 28 U.S.C. §1446(d).

WHEREFORE, Defendant removes to this Court the above-entitled action, now pending in the Court of Common Pleas of Allegheny County, Pennsylvania, Civil Division, and requests that this action be placed on the docket of this Court for further proceedings as though this action had originally been instituted in this Court.

Respectfully submitted,

**MARSHALL DENNEHEY
WARNER COLEMAN & GOGGIN**

BY:



Danielle M. Vugrinovich, Esquire

PA ID #88326

**Attorney for Defendant, Midland Credit
Management, Inc.**

Union Trust Building, Suite 700

501 Grant Street

Pittsburgh, PA 15219

412 803-1185

412 803-1188/fax

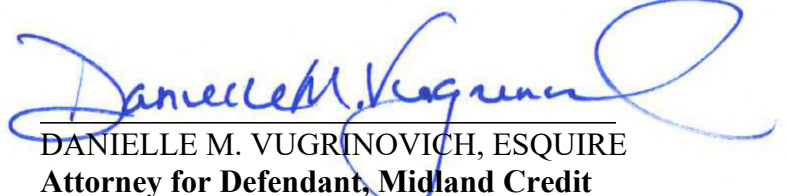
dmvugrinovich@mdwgcg.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing **Petition for Removal of a Civil Action** has been served upon the following known counsel of record this 18th day of March 2021, via electronic mail:

Kevin Abramowicz, Esquire
East End Trial Group, LLC
186 42nd Street
P.O. Box 40127
Pittsburgh, PA 15201
kabramowicz@eastendtrialgroup.com
(Counsel for Plaintiff)

**MARSHALL DENNEHEY
WARNER COLEMAN & GOGGIN**



DANIELLE M. VUGRINOVICH, ESQUIRE
**Attorney for Defendant, Midland Credit
Management, Inc.**